## THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	]	
	]	
v.	]	Cr. No. 19-cr-142-01-LM
	]	
	]	

## NATHAN CRAIGUE

## ASSENTED-TO MOTION TO CONTINUE TRIAL FOR 30 DAYS

The defendant, Nathan Craigue, through his counsel, Dorothy E. Graham, AFPD, files this motion respectfully requesting that the Court continue his trial, currently scheduled for January 22, 2020 for 30 days.

Grounds follow.

On July 10, 2019, Craigue was indicted for two counts of False Statement to a Federal Agent in violation of 18 U.S.C. § 1000. It is alleged that Craigue knowingly and willfully made material false statements to an OSHA Compliance Safety & Health Officer by stating that KM was a subcontractor.

Additional time is required to prepare this case and Mr. Craigue for trial. Counsel also expects to file pleadings with the Court that will likely require additional time to address.

The government, through AUSA John Davis, assents.

Mr. Craigue is in agreement and waives his right to a speedy trial. A written waiver will be filed with the Court within ten days.

Wherefore the defendant respectfully moves the Court to grant this motion and to continue the trial for 30 days, and for such other relief as may be deemed just.

Respectfully submitted,

Date: January 2, 2020 /s/ Dorothy E. Graham

Dorothy E. Graham N.H. Bar No. 11292 Assistant Federal Defender 22 Bridge Street, 3<sup>rd</sup> floor Concord, NH 03301 Tel. (603) 226-7360

E-mail: Dorothy\_Graham@fd.org

## **CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on the following person on January 2, 2020 and in the manner specified herein: electronically served through CM/ECF to AUSA John Davis.

/s/Dorothy E. Graham
Dorothy E. Graham